Comments on NJDEP White Paper: VOC011 - Adhesives and Sealants

Control Measure Summary from NJDEP White Paper: Enact VOC content limitations for application of solvent-based adhesives and sealants	Emissions (tons/yr) in New Jersey (from NJDEP White Paper)		Comments on NJDEP White Paper
2002 existing measures in New Jersey: No existing limitations for this specific category.	**VOC in 2002**	4,701 tons/yr	The NJDEP provides no references for the sources of this emissions data and therefore there is insufficient data to provide detailed comments. It is unclear whether the NJDEP is actually presenting emissions data from the California study referenced in Candidate Measure 1, not emissions data specific to New Jersey sources. It is also unclear why the White Paper references SO2 and NOx emissions, which are not associated with adhesives and sealants. As a general note, no sources of information are cited for this White Paper.
Candidate Measure 1: VOC content limits This measure has been enacted by various Air Pollution Control Districts in California from 1998 to 2001. Emission Reductions: 3,012 tpy Based on a 60% reduction in total emission for solvent-based materials (Assumes 75% of VOC emissions originate from solvent-based adhesives and sealants and that the remaining 25% of VOC in this category are mixed with water-based materials.) Estimated cost of control by reformulation: <$2,500/ton (based on 1999 dollars) Estimated cost of add-on control: range $10,000/ton - $100,000/ton. Timing of Implementation: Phased approach Implementation Area: State-wide	**VOC** **2002 Base:** **2009 Reduction:** **2009 Remaining:**	4,702 tpy -3,012 tpy 1,690 tpy	The source of the baseline level of VOC emissions as well as the apportioning of the VOC emissions between solvent-based and water-based materials is not provided. The estimated VOC emission reductions are derived from an out-of-state regulatory agency, and no information is presented to suggest that these values are representative for New Jersey sources. Further, the emissions reduction values do not appear to match the estimated 60% reduction for solvent-based materials. If the NJDEP is proposing new limits for the VOC content of adhesives and sealants, these limits should be clearly presented for comment. Until baseline VOC emission rates are established, and VOC emission reduction rates substantiated, any presentation of VOC emission reductions or cost effectiveness is premature and can not be substantiated. Further, it would be more helpful and more representative if the cost per ton information reflected year 2006 values, not cost factors from 7 years ago.
Policy Recommendation of State/Workgroup Lead: Revise N.J.A.C., Subchapters 16 and 24, to establish new standards. Consider exemptions for quart or gallon containers of retail contact cements, for materials used for specific applications (tire repairs, R&D, and solvent welding of medical devices), for low VOC materials (< 20 g/L), for low usage application (< 55 gal/yr) and for small sources (< 200 lb/yr).			Although studies and regulatory actions conducted in California may be helpful sources of data for NJDEP, before any regulatory action, the NJDEP needs to provide detailed information on baseline VOC emissions and control costs specific to New Jersey sources. This process should be conducted with open participation from the regulated industry, who can offer their expertise in sealant and adhesive operations and emission estimating